

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:

Todd A. Brunner and
Sharon Y. Brunner,

Case No. 11-29064
Chapter 11

Debtors.

**MOTION BY DEBTOR TO SELL VEHICLES AND BOATS OUTSIDE OF THE
ORDINARY COURSE OF BUSINESS PURSUANT TO 11 U.S.C. § 363(b)**

Debtors move the Court for authority to sell some of their vehicles and boats pursuant to 11 U.S.C. § 363(b) and allege and show to the Court as follows:

1. On June 5, 2011, the Debtors filed a *Petition* under Chapter 11 of Title 11, United States Code, in the United States Bankruptcy Court for the Eastern District of Wisconsin.
2. Since the date of filing, the Debtors have been operating and managing their properties in accordance with 11 U.S.C. §§ 1107 and 1108.
3. The Debtors desire to sell a 1998 Chaparral deck boat for \$5,000.00, and the vehicles listed in Schedule A for the values placed next to them.
4. The Debtors intend to list the vehicles on eBay for sale purposes and propose to sell the boat and the vehicles at the minimum price indicated in paragraph 3 and Schedule A attached hereto.
5. The Debtors intend to use the funds generated to defray and pay authorized administrative expenses, including professional fees of the attorney for the Official Committee of

Law Offices of Jonathan V. Goodman
788 N. Jefferson Street, Suite 707
Milwaukee, WI 53202
414-276-6760; 414-287-1199 (facsimile)
jgoodman@ameritech.net

Unsecured Creditors and of Debtors' counsel, and to utilize any other funds available as a sinking fund to pay any unforeseen expenses, such as extensive repairs to their buildings.

Dated this 15th day of November, 2011.

LAW OFFICES OF JONATHAN V. GOODMAN
Attorneys for Debtors

By: /s/ Jonathan V. Goodman

PREPARED BY:

Law Offices of Jonathan V. Goodman
788 N. Jefferson Street, Suite 707
Milwaukee, WI 53202
414-276-6760; 414-287-1199 (facsimile)
jgoodman@ameritech.net

SCHEDULE A

Motorcycles	Minimum Sale Price
1997 Harley Davidson	\$5,000.00
2006 Dune Buggy	\$500.00
2004 Yamaha 4x4	\$1,300.00
Vehicles	Minimum Sale Price
2002 Cadillac Escalade	\$4,000.00
1963 Bentley S-3	\$4,000.00
1959 Jaguar	\$500.00
1919 Rausch Electric Car	\$10,000.00
1996 Lincoln Limousine	\$3,500.00
1997 Suburban	\$1,500.00
1937 Ford Street Rod	\$10,000.00
2006 Ford 40-ton Cabs	\$3,000.00
2004 GMC Pick-up	\$2,500.00
1994 Rolls Royce	\$6,500.00